

# CP&L

Carolina Power & Light Company

Brunswick Nuclear Project  
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U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

BRUNSWICK STEAM ELECTRIC PLANT UNITS 1 & 2  
DOCKET NO. 50-325 & 50-324  
LICENSE NO. DPR-71 & DPR-62

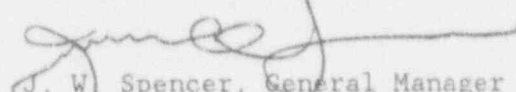
Gentlemen:

During the week of October 21-25, 1991, inspection 91-31 of the Brunswick Generic Letter (G.L.) 89-10 program was conducted. In the ensuing inspection report, a written response was requested regarding a concern that neither the Brunswick program nor its implementing procedures provided guidance for performance of the post-maintenance and post-modification testing needed to ensure that correct switch settings are maintained in accordance with the generic letter.

As noted in the inspection report, a Corporate level post-maintenance testing guidance matrix for valves that have received their G.L. 89-10 baseline testing has been drafted but has not yet been formally implemented at the Brunswick facility. Brunswick intends to incorporate the PMTR matrix into Engineering Procedure ENP-17, "Pump and Valve Inservice Testing." This procedure revision should be complete by March 31, 1992.

The inspectors also concluded that the "Nuclear Plant Modifications Program" (NPMP) does not provide procedural guidance for performance of post-modification testing of MOV's to ensure correct switch settings are maintained in accordance with G.L. 89-10. CP&L will incorporate this guidance into Nuclear Engineering Department (NED) design guide DG-VIII.41, "Design Guide for the Preparation of Plant Modification Acceptance Test (A.T.)." This procedure will be revised by June 30, 1992, which is well in advance of the next scheduled Brunswick Nuclear Plant refueling outage. The enhancement of this procedure should provide the guidance necessary to alleviate the concerns raised in the inspection report.

Very truly yours,

  
J. W. Spencer, General Manager  
Brunswick Nuclear Project

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Enclosure

cc: Mr. S. D. Ebnetter  
Mr. N. B. Le  
BSEP NRC Resident Office